

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DILIGENT ENTERPRISE MANAGEMENT, INC.,

*Plaintiff,*

Case No. 24-cv-02228-VEC

- against -

AML GLOBAL ECLIPSE, LLC, DWC PINE  
INVESTMENTS I, LTD., ALAN KLAPMEIER,  
JAMES CARROLL, STEVE SERFLING, RJ  
SIEGLE, and MIKE WYSE,

*Defendants.*  
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**NOTICE OF MOTION TO  
WITHDRAWAL AS COUNSEL  
OF RECORD FOR PLAINTIFF**

**PLEASE TAKE NOTICE** that, upon the annexed declaration of Darryl R. Graham, Esq., and all prior pleadings and proceedings in this matter, the undersigned attorney will move this Court, at the United States Courthouse, 40 Foley Square, New York, NY 10007, before the Honorable Valerie E. Caproni, U.S.D.J., on a date to be determined by the Court, for an Order: (a) pursuant to Rule 1.4 of this Court's Local Civil Rules, permitting Darryl R. Graham and his firm, Akerman LLP, to withdraw as counsel for plaintiff and granting plaintiff a period of time to retain new counsel to appear in this matter; and (b) granting such other and further relief as is just and proper.

Dated: New York, New York  
June 14, 2024

AKERMAN LLP

By: /s/ Darryl R. Graham  
Darryl R. Graham  
1251 Avenue of the Americas, 37<sup>th</sup> Floor  
New York, New York 10020  
Tel. No.: (212) 880-3800  
E-Mail: [darryl.graham@akerman.com](mailto:darryl.graham@akerman.com)

*Counsel for Plaintiff*